

ILLINOIS DEPARTMENT OF PUBLIC HEALTH
Division of Environmental Health – Structural Pest Control Program

Inspection Cover Sheet

CASE #	7-17-298-01	DATE SENT	01/09/18	INSPECTOR	BO
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REPORT TYPE: ☒ INITIAL ☐ SUPPLEMENTAL ☐ REINSPECTION ☐ EJ AREA

STATUS: ☐ CLOSED ☒ PENDING REFERRED TO: _____ ☐ EPA REVIEW

BUSINESS NAME	Industrial Fumigant			ID #	051 -- 002038	
CITY	Chicago Ridge	ZIP	60415	PHONE#	(708) 636-3460	
UNCERTIFIED TECHNICIAN						
PUI CITY		PUI ZIP		PUI COUNTY		
CERTIFIED TECHNICIAN				ID #	052 --	
PUI CITY		PUI ZIP		PUI COUNTY		

INSPECTION DATE	INSPECTION TYPE							SAMPLES				ACTIONS		
	N / C B I	V E H	P U I	M I S	U P I S	U P I M	L I C	D O C	C H E M	P H O T O	O T H E R	W A R N	S T O P	O T H E R
10/25/17				1								3		

VIOLATIONS

Section 830.870 a) 1) Failure to notify the Department within 1 business day of becoming aware Exemption 6
Exemption 6 human. Section 830.820 d) 3) No time on records Section 830.830 d) failure to ventilate to prevent Exemption 6

INSPECTION SUMMARY

Exemption 6 caused by Methyl Bromide leaking from a canister.

PENDING

Legal case to be submitted

ILLINOIS DEPARTMENT OF PUBLIC HEALTH
Division of Environmental Health
525 W. Jefferson St., Springfield, IL 62761

NOTICE OF INSPECTION

Case # 7-17-298-01

Address (Central or Regional Office)

Date 10/25/17 Hour 9:40 ^{a.m.} p.m.

Name of Individual Dale Vestal
Dan Ponton

Title Exec Vice Pres General Man.

Name and Address of Business or Investigation Site
Industrial Emigrant
6663 W 99th St
Chicago Ridge IL 60415

Business I.D. Number OSI-002038

Telephone Number 708-636-3460

Signature of IDPH Representative [Signature]

Title PSA

Notice of inspection is hereby given pursuant to Section 10(g) and 10(h) of the Structural Pest Control Act (Act), 225 ILCS 235/10(g) and 10(h) and the Structural Pest Control Code (Code), 77 Ill. Adm. Code 830; Section 3 and 15 of the Illinois Pesticide Act (IPA), 415 ILCS 60/3 and 15; and/or Section 8 and 9 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 U.S.C. 136f and 136g.

Reason for Inspection

- ☒ To determine compliance with the Act and its adopted Code.
- ☒ To determine that pesticides are being stored, handled and disposed of in such a manner so as to minimize illness and injury to people of the state.
- ☒ To investigate complaints or reports of injury to individuals and/or property associated with pesticide use.
- ☐ To inspect and obtain samples of any pesticides or devices packaged, labeled and released for shipment, and samples of any containers or labeling for such pesticides or devices, in places where pesticides or devices are held for distribution or sale [Sec. 9(a) of FIFRA and Sec. 15 of the IPA].
- ☐ To inspect and obtain copies of those records specified in Section 8 and 40 CFR Part 169 [Sec. 8 of FIFRA and Sec. 15 of the IPA].
- ☐ To obtain samples of pesticides, labels, containers or devices used.
- ☐ To assure that pesticides are being used in accordance with their labeling.
- ☐ To assure recordkeeping requirements of pesticide use.
- ☒ To assure proper licensing, registration and certification.
- ☒ To assure that pesticides are used/sold in accordance with FIFRA and the IPA.

Violation(s) Suspected

Incident notification Failure

Submit records for M.B. Fumcon
10/23/17 (Monday) and review records
for 10/20/17 Friday (if any)

IMPORTANT NOTICE - THIS STATE AGENCY IS REQUESTING DISCLOSURE OF INFORMATION THAT IS NECESSARY TO ACCOMPLISH THE STATUTORY PURPOSE AS OUTLINED UNDER PUBLIC ACT 79-578. DISCLOSURE OF THIS INFORMATION IS MANDATORY. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

CONSENT TO PROPERTY ACCESS

I, the undersigned, voluntarily consent to allow the Illinois Department of Public Health personnel access to property under my ownership or control for purposes of inspecting and sampling, if necessary, in the conduct of their official inspection.

Signature [Signature]

Title Ex V.P. Gen. Man.

Date 10/25/17

MEMORANDUM

To: Division of Environmental Health
Springfield
Dr. Curt Colwell

From: Division of Environmental Health
West Chicago Regional Office
Barbara O'Meara

RE: Cook County, Illinois

IFC, Industrial Fumigation Co. LLC
ID# 051-002038
Case # 7-17-298-01

Date: October 30, 2017

October 24, 2017

Public Service Administrator Barbara O'Meara (PSA BO) received a phone call from program manager Dr. Curt Colwell (PSA CC) concerning a possible **Exemption 6** pesticide exposure. What was known at this time, approximately 3pm on Tuesday afternoon October 24, 2017, was that an employee of Industrial Fumigation Company (IFC) **Exemption 6** around 2:00 am at Palos Community Hospital.

October 25, 2017

PSA BO, and Environmental Health Specialist Sharon Smith (EHS SS) visited the location of IFC in Chicago Ridge, Illinois. IFC is located at 6663 W 99th Street in an industrial area of one-story brick buildings running about 5 blocks behind a residential area. The building housing IFC was typical of the area, a single story blond brick structure with a front door on the north side and two two-story garage doors on the west side. There were no access points observed on the south or east sides of the building. Arriving at around 9:00 am, there was no answer when knocking on the door. We waited to see if anyone would enter the building. Later that morning, PSA BO decided to contact the nearest Orkin location to see if they had access to any of the employees of IFC. Orkin is the owner of IFC, and PSA BO thought they might help in finding someone to speak with. We drove to the nearest Orkin, located at 5336 W 124th Street, Alsip, Illinois. There we spoke with Gary, a manager for Orkin, who wasn't sure who to contact, so he called his Regional Manager, Steve Vey. PSA BO spoke with Mr. Vey who stated he was on his way to the Green Bay, Wisconsin area he would find someone that could contact PSA BO when he got there around noon. Since it was still before noon, PSA BO and EHS SS were able to go to the fire department to see if anyone there had more information.

At the Chicago Ridge Fire Department, 10063 Virginia Avenue, we spoke with Captain Bob Smart. Captain Smart had not been on duty Monday night, October 23, when the first call had come in, but he was called in later that evening. The following is a synopsis of his information:

*Captain Smart believed the first call to anyone came shortly after 4:30 pm on Monday, October 24, 2017. That was a well-check call from **Exemption 6** who had contacted **(b) (6)** saying **Exemption 6** was not feeling right and could **Exemption 6** come pick **Exemption 6** up. **Exemption 6** stated that someone was on their way but **Exemption 6** did not answer **Exemption 6** phone. The Chicago Ridge police responded to 6663 W 99th Street, the business location for IFC. The police were unable to access the building as everything was locked. Another employee, Brady Ponton, arrived shortly thereafter and opened the building. The police entered (requesting **Exemption 6** stay outside).*

They found an employee, Exemption 6 in the restroom conscious Exemption 6. They called for an ambulance. The ambulance transported Exemption 6 to Palos Community Hospital. At some point afterward, the firefighters realized they had forgotten their sugar monitor and returned to the IFC location. There Exemption 6 told the firemen that Exemption 6 may have been exposed to methyl bromide, a fumigant, and Exemption 6 was getting a reading just outside the garage door of 40 ppm. The fire personnel then reviewed the chemical and called the ambulance, policemen and fire department to the hospital for decontamination. Palos Community Hospital's emergency room was locked down and precautions taken. Meanwhile the police returned to IFC and cordoned off and locked the building. The police drove by the building every hour that night to ensure no one entered the building.

Exemption 6. Captain Smart stated that Exemption 6 had told them that Exemption 6 over the weekend. At this time we have no idea to whom this was said but it did come up during the conversation with Captain Smart. The Captain returned to the building around 6:00 am on Tuesday morning, October 25. When he arrived, another IFC employee was present who had taken a reading in the building of 4 ppm, and had opened the garage door. Captain Smart asked that he not enter the building and to let it ventilate until later in the day. While sitting in the Captain's office, he received a phone call from Daniel Ponton requesting access to the building. When the captain was finished we thanked him and headed over to the IFC building.

We arrived at the IFC building right about noon and spoke with Dale, who stated he was the regulatory liaison, and Kathy the risk mitigation specialist for Rollins. Dale stated that OSHA was going to arrive at 1pm so PSA O'Meara decided, instead of repeating everything twice, she and EHS SS would go have lunch and return when the OSHA representative arrived at about 1 pm.

Around 1 pm, we returned to the building and met with, Dale and Kathy from Rollins. Also present were Daniel Ponton and Brady Ponton, father and son, both employees of IFC, and lastly Barbara Smith the OSHA inspector. Daniel Ponton is the executive vice president of IFC located in Kansas and Brady Ponton is a technician for IFC in Chicago Ridge who had worked for and with Derek Mesebring for at least 7 years. The Rollins officials had a hygienist with them who had done air monitoring in the last hour and who had cleared the building for entry. We went through the two-story garage door to the back of the building which was spacious and used for chemical storage. After introductions, PSA BO asked Barbara Smith if she would like to start her interview. Ms. Smith declined, saying she would rather hear what PSA BO would ask. The following is a summary of that interview/discussion:

In trying to establish a timeline of what could have happened PSA BO posed most questions to Brady Ponton. Brady had been with IFC for about 7 years and Exemption 6 was his supervisor and friend. Brady said he did not have any knowledge of Exemption 6 over the weekend but stated that Exemption 6, complaining of not feeling well quite a bit of the time. Brady said he was with Exemption 6 on Friday night during which time Exemption 6 had played bass in his band. They were also together on Saturday night and though they didn't see each other on Sunday, Brady thought they had texted each other. Brady explained that he had talked with Exemption 6 Monday morning at around 10:00 am when Exemption 6 had been painting the front office area and said Exemption 6 was planning on doing a fumigation at noon. Brady had no idea if that service ever took place. Later that afternoon, Exemption 6 contacted Brady and asked if he would go pick up Exemption 6 because Exemption 6 had called Exemption 6 a 2:00 pm and thought Exemption 6 had food poisoning and was too ill to drive. Exemption 6 asked if Brady would pick up Exemption 6. Brady agreed, on the way tried to call Exemption 6 numerous times which was worrisome. Brady contacted Exemption 6 and asked Exemption 6 to please call the police and ask for a well-being check. Exemption 6 did, and the police went over to IFC. PSA BO asked that they find out if that service was done and submit the records for that service if it occurred. If that service did not happen, PSA BO asked that the records be examined and the

date of Exemption 6 last fumigation forwarded to [REDACTED] Both Daniel and Brady said they would try to locate those records as requested.

Brady believed that Exemption 6 had filled a smaller fumigation cylinder from the larger one located in the back of the warehouse, and for some reason never completely closed the cylinder's valve.

When Brady arrived the police were outside trying to get into the building. Brady said the police would not let him enter the building with them so he waited outside. He said that after Exemption 6 was taken by ambulance, the police officers were still there and one of them asked if there was any reason to think that this was a chemical exposure, Brady said he told them there was no reason to think that and he had thought Exemption 6 had food poisoning.

After the police left Brady walked into the back warehouse area and was talking with his father, the Eastern Regional Vice President. He looked over at the methyl bromide cylinder and thought someone had left a paper towel on the cylinder because there was a patch that was white in color. When he got closer he realized it was ice built up from the methyl bromide leaking out of the cylinder. He immediately shut the valve and exited the building. He said he was standing outside the garage door and took a reading of 40 ppm outdoors. At that time Brady said he knew he needed to let someone know but wasn't sure who to call, when the fire department returned for their sugar monitor. Brady explained to them that it may have been methyl bromide poisoning, to which the fire department responded by contacting the hospital as stated earlier by Captain Smith. Brady also went to the hospital and was checked out and cleared. All first responders were cleared at the hospital. Brady stayed at the hospital with the family until Exemption 6 early the next morning. EHS III SS inquired as to monitoring or alarm systems within the building to alert everyone to a methyl bromide leak. There was no such system, all that they had was a handheld monitoring device which was the same that Brady had used the night of October 23 when standing outside the garage door. No one could guess how much Methyl Bromide had leaked out, they did not have a way of measuring that.

With most of the timeline filled in, PSA BO asked Barbara Smith with OHSA if she would like to ask anything, she declined. This ended the meeting at IFC.

Conclusion

At this time we have received no new information to change this department's findings. The company, IFC, failed to notify the department of a pesticide incident; Section 830.870 (a) any license, registrant or certified technician shall notify the Department within one business day of becoming aware of an Exemption 6 of a human. This is a type A violation with human harm and as such carries a \$1800 fine. It is noted that Exemption 6 was the manager of the IFC location and probably would have been the individual to report such an incident to the Department, though there are other certified technicians at this location that could have reported it, but probably did not think of it under the circumstances.

This Department will amend or supplement this report upon receipt of the requested records. Since no person was present during the Monday work day when Exemption 6 was exposed to methyl bromide, we may not find out exactly what happened in those hours between 10:00 am and 2:00 pm. A visitation service is scheduled on Friday November 3, 2017, and this Department will wait until the week after to make any further inquiries.

MEMORANDUM

To: Division of Environmental Health
Springfield
Dr. Curt Colwell

From: Division of Environmental Health
West Chicago Regional Office
Barbara O'Meara

RE: Cook County, Illinois

IFC, Industrial Fumigation Co. LLC
ID# 051-002038
Case # 7-17-298-01

Date: January 9, 2018

November 21, 2017

This department received an email with fumigation records for the October 23, 2017 application at USA Intercargo, LLC. Located at 7751 West 88th St. in Bridgeview, IL 60456. As these records indicate a fumigation was done by the **Exemption 6**, on the 23rd of October **Exemption 6** must have then returned to the office of Industrial Fumigant and been overcome by Methyl Bromide at that time.

A review of the records and a follow up email, on November 29, to Daniel Ponton shows that no time is being included on the records. This is a violation of Section 830.820 d) 3) and a Type C violation. This will be addressed in a violation letter to Industrial Fumigant.



IDPH

ILLINOIS DEPARTMENT OF PUBLIC HEALTH

245 West Roosevelt Road • West Chicago, Illinois 60185-3739 • www.dph.illinois.gov

January 11, 2017

STRUCTURAL PEST CONTROL CASE

RE: Case # 7-17-298-01

Daniel Ponton
The Industrial Fumigant CO
6663 West 99th Street
Chicago Ridge, Illinois 60415

Dear Mr. Ponton:

The Department of Public Health is responsible for the Administration of the Structural Pest Control Act (Act), 225 ILCS 235/1 et seq, and the Structural Pest Control Code (Code), 77 Ill. Adm. Code 830. Through this Act, the Department regulates all commercial (for hire) structural pest control business locations and certifies by examination individuals associated with the commercial location in the use of general and restricted pesticides.

This Department has reviewed the documentation submitted by Industrial Fumigant concerning the pesticide incident that occurred on October 23, 2017 and the following determinations have been made. Industrial Fumigant failed to notify this department within one (1) business day of becoming aware of a human death, a violation of Section 830.870 a) 1) a Type "A" violation. Pesticide Storage areas are to be ventilated to the outside to prevent the build-up of gases, this had not been done and is a violation of Section 830.830 d) a Type "C" violation. The records of service that were submitted lacked a time regarding the application a violation of Section 830.820 d) 3) a Type "C" violation. In order to correct the records violation please submit a corrected record showing the time being recorded. A training of all technicians at the Chicago Ridge office reviewing 830.820 d) 3) and a roster submitted to this Department by February 9, 2018 is required. A ventilation system that will remove the build-up of gases must be implemented at the Chicago Ridge office and notification when this has been accomplished must be made to this Department by February 9, 2018. The final violation is a Type "A" and will be referred to legal and may result in a monetary fine. These violations will stay on Industrial Fumigant's record for the next three (3) years and any subsequent violations may result in additional monetary fines. Please consult the SPCA and Code for further information.

Should you have any questions or comments about anything addressed in this letter please contact Ms. Barbara O'Meara at 245 West Roosevelt Road, Building 5, West Chicago, Illinois 60185 telephone 630/293-6800, fax 630-293-6908, or email Barbara.Omeara@illinois.gov.

Sincerely,

Barbara O'Meara MPH, LEHP
Public Service Administrator

cc: Regional Office, Central Office



The Industrial Fumigant Company, LLC

13420 West 99th Street • Lenexa, Kansas 66215-1365

(913) 782-7600 • Fax: (913) 782-6299 • Website: www.indfumco.com • E-mail: ifc@indfumco.com

November 21, 2017

Via Email

Ms. Barbara O'Meara
Public Service Administrator
Illinois Department of Public Health
245 Roosevelt Road - Building 5
West Chicago, IL 60185-3739

RE: Structural Pest Control Case (Case #7-17-298-01)

Dear Ms. O'Meara:

This letter is in reply to yours of November 13, 2017. As requested, attached are fumigation records for Industrial Fumigant Company activities which occurred on 10/23/17, and the plan dated 10/19/17 for that fumigation.

During the October 25, 2017 inspection, our understanding was that the Department would be sending a written request. We did promptly collect the documentation we understood you to seek as noted on the enclosed copy from that Notice of Inspection, as signed by me. We trust the attached documentation also suffices as response to your letter dated November 13, 2017.

We note that the Notice attached to your letter dated November 13, 2017 differs from the enclosed Form which I signed on October 25, 2017. Please advise if you have any questions after reviewing the attached documents.

Sincerely,

Daniel E. Ponton
Executive Vice President & General Manager

Attachments

P.001/001

(FAX)

11/01/2017 13:28



RAILCAR/TRAILER FUMIGATION SERVICE REPORT

IFC

6663 W. 9th St. Chicago Ridge, IL 60415
(708) 636-3460

Current FMP On File?

☒ Yes
☐ No

Date(s) and Time of Service: 10/23/17

Customer: USA Interargo, LLC

Address: 7751 West 88th St.

City, State: Bridgeview, IL 60455

Billing Address: _____

Pesticide Used	(1) Methyl Bromide
EPA Registration #	5785-11
Commodity Treated	Used Cars
Target Pest	Brown Mammated Slink Bug
Concentration	100%
Less than Label?	No
Batch or Lot #	420088288

Detection Equipment Used: Toxi-Ras

Date of Last Calibration: _____

Expiration Date of Tubes: N/A

Atmosphere Tested For: Methyl Bromide

Pesticide Transported Via:

☐ Common Carrier - Attach Manifests

☒ IFC - Attach Manifests

☐ Stored On Site

Railcar/Trailer #	Quantity Used	Application Rate	Cu. Ft.	Seal # Applied	Commodity Temp. & Moisture	External Temp. & Humidity	Wind/ MPH	*Safety Monitoring	Efficacy Reading
TCNUS286382	9 lbs	3 lbs/1000 ft3	3000	IFC Lock	—	60 deg/60%	5-10	N/A	N/A

FOR RAILCAR/TRAILER AERATION:

Railcar/Trailer #	Date/Time	Seal # Removed	Amount of Fumigant Removed	Amount of Fumigant as per Placard/Sign	Bonnet Applied	Salco Disk or Weather Shield Used	Security Seal # During Aeration	*Safety Monitoring	Seal # Once Aeration is Final (if applicable)	Final Reading at Fumigated Site	Final Reading at New Transfer Site
TCNUS286382	10/24/17	IFC Lock	Methyl Bromide	Methyl Bromide	—	—	—	ND	None	0	—

*Safety monitoring consists of monitoring in worker breathing zone and around treated site.

ND = None Detected

Exemption 6

Signature & License # of Applicator In Charge

Plant Supervisory Personnel

Date

FUMIGATED BY MEIERBRING AERATED BY HERRINGTON

H. H. H.

O'Meara, Barbara

From: Dan Ponton <DPonton@indfumco.com>
Sent: Friday, December 01, 2017 12:01 PM
To: O'Meara, Barbara
Subject: [External] RE: Case #7-17-298-01
Attachments: Derek E-Mail 102317.pdf

Ms. O'Meara,

In response to your email below, records show (see attached) that Exemptio went to fumigate the container on the morning of 10/23/17. Without having direct information from Exemptio we knew the container needed to be aerated the next morning and a technician was sent to check on status and aerate the container.

Thanks,
Dan

Dan Ponton | Executive Vice President & General Manager
IFC – The Industrial Fumigant Company, LLC – www.indfumco.com
direct 913.397.1150 | main 913.782.7600 or 800.477.4432 | fax 866.289.1476

"Providing Pest Management Solutions to the Food & Commodity Industries for over 80 Years"

From: O'Meara, Barbara [mailto:Barbara.Omeara@illinois.gov]
Sent: Wednesday, November 29, 2017 2:17 PM
To: Dan Ponton
Subject: RE: Case #7-17-298-01

Mr. Ponton,

Thank you for responding to my letter. All the documentation that you sent gives us a good indication as to what happened on October 23, 2017. I do have one question...how did the technician know when to go back to aerate the fumigation site on October 24, 2017? I could find no application time on the records, did I miss this, or is there some other place that the time is recorded? If you have something that indicates the application time please forward that to me.

Again, email is fine.

Barb O'Meara

From: Dan Ponton [mailto:DPonton@indfumco.com]
Sent: Tuesday, November 21, 2017 5:29 PM
To: O'Meara, Barbara <Barbara.Omeara@illinois.gov>
Subject: [External] Case #7-17-298-01

Dear Ms. O'Meara,

Attached are the documents you requested. Please let us know if you need anything additional or have questions.

Regards,
Dan

Dan Ponton | Executive Vice President & General Manager
IFC – The Industrial Fumigant Company, LLC – www.indfumco.com
direct 913.397.1150 | main 913.782.7600 or 800.477.4432 | fax 866.289.1476

"Providing Pest Management Solutions to the Food & Commodity Industries for over 80 Years"

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

Brad Henry

From: Exemption 6
Sent: Monday, October 23, 2017 10:27 AM
To: Suren Vardanian
Subject: RE: Pesticide Agreement - USA Intercargo, LLC_Bridgeview, IL

Suren,

I will be heading your way shortly. I should arrive within a half hour or so.

Exemption 6
IFC – The Industrial Fumigant Company, LLC – www.indfumco.com
direct Exemption 6 | main 708.636.3460 | fax 708.636.5838
"Providing Pest Management Solutions to the Food Industry for over 80 years"™

From: Suren Vardanian [suren@usaintercargo.com]
Sent: Friday, October 20, 2017 9:18 AM
To: Valerie Locke
Cc: Derek Mesenbring
Subject: RE: Pesticide Agreement - USA Intercargo, LLC_Bridgeview, IL

Hello

Please see attached.

Exemption 6 can you confirm when you can do it?

Thanks.

From: Valerie Locke [mailto:VLocke@indfumco.com]
Sent: Thursday, October 19, 2017 3:50 PM
To: Suren Vardanian <suren@usaintercargo.com>
Cc: Exemption 6
Subject: Pesticide Agreement - USA Intercargo, LLC_Bridgeview, IL
Importance: High

Good afternoon Mr. Vardanian:

Attached please find documentation for your attention. Thank you!

Valerie Locke | Administrative Assistant
IFC – The Industrial Fumigant Company, LLC – www.indfumco.com
Direct 913.397.1188 | Main 913.782.7600 or 800.477.4432 | Fax 866.789.5966



"Providing Pest Management Solutions to the Food Industry for over 80 years"™



The Industrial Fumigant Company, LLC

13420 West 99th Street • Lenexa, Kansas 66215-1365

(913) 782-7600 • Fax: (913) 782-6299 • Website: www.indfumco.com • E-mail: ifc@indfumco.com

CERTIFICATE OF FUMIGATION

October 27, 2017

THIS IS TO CERTIFY that the issuer of this certificate is a representative of a duly licensed fumigation company duly operating pursuant to and as authorized by the laws and regulations of the State of Illinois, USA.

IT IS FURTHER CERTIFIED, that all product of USA Intercargo, LLC has been fumigated with Methyl Bromide according to the label directions of the manufacturer of said fumigant as approved by the U. S. Environmental Protection Agency (EPA):

Location where fumigated:

USA Intercargo, LLC
7751 West 88th Street
Bridgeview, Illinois 60455

Commodity fumigated:

Used Vehicles

Date fumigated:

October 23, 2017

Fumigation Duration:

24 Hour Hold

Fumigation Dosage:

3 Lbs./1,000 Cubic Feet at 60-68° F

Fumigant Lot #

8200AE272

Licensed fumigator:

Exemption 6

Trailers Fumigated:

TCNU3286362

The Industrial Fumigant Company, LLC

Lynn Hanse
Vice President of Administration

vi



The Industrial Fumigant Company, LLC

13420 West 99th Street • Lenexa, Kansas 66215-1365

(913) 782-7600 • Fax: (913) 782-6299 • Website: www.indfumco.com • E-mail: ifc@indfumco.com

October 19, 2017

Mr. Suren Vardanian
Terminal Manager
USA Intercargo, LLC
7751 West 88th Street
Bridgeview, Illinois 60455

Dear Mr. Vardanian:

It is our pleasure to submit our Pesticide Application Agreement for USA Intercargo, LLC. Also enclosed is a Hold Harmless Agreement which must be signed and returned with the executed Agreement prior to the fumigation.

After you have reviewed our Agreements and they meet with your approval, please sign and return a copy of each to our office immediately. *If you wish, you need return only the signature pages via facsimile to (866) 789-5966.*

We appreciate this opportunity to serve you. Should you have any questions, please feel free to give us a call.

Kind regards,

Lynn Hansen
Vice President of Administration

vi

Enclosures

c: Exemption 6
Mr. Brad Henry, Vice President Eastern U.S. (800) 477-4432

Industrial Fumigant Company,
An Illinois Limited Liability Company

13420 West 99th Street, Lenexa, Kansas 66215-1365
Phone (913) 782-7600 • Fax (913) 782-6299

PESTICIDE APPLICATION AGREEMENT

This Agreement is made by and between The Industrial Fumigant Company, LLC, hereinafter referred to as IFC, and

USA Intercargo, LLC
7751 West 88th Street
Bridgeview, Illinois 60455

hereafter referred to as "Client", for the treatment of commodities and/or space by IFC for Client on the terms and conditions and for the consideration set forth in this Agreement.

1. CLIENT ADDRESS (Where pesticides are to be applied):

Same as Above

DESIGNATED SITE CONTACT: Suren Vardanian, Terminal Manager

2. AREAS TO BE TREATED:

One (1) Container

3. VOLUME OR QUANTITY OF COMMODITIES TO BE TREATED:

3,000 Cubic Feet

4. PESTICIDES TO BE USED:

Methyl Bromide

Target Pests: Brown Marmorated Stink Bug

5. DATE AND TIME OF SCHEDULED TREATMENT:

October 23, 2017

6. IFC is to assume responsibility for sealing and preparing the building/area for treatment.

7. IN CASE OF AN EMERGENCY: Notify the Manager in charge or call IFC Corporate Office at (800) 477-4432.

8. THE INDUSTRIAL FUMIGANT COMPANY, LLC ASSUMES RESPONSIBILITY FOR THE FOLLOWING:

- a. IFC agrees to exercise all reasonable and practical efforts to apply the pesticides listed in #4 in a manner consistent with instructions, procedures, directions, and precautions set forth in the labeling of the pesticide as required by EPA.
- b. Client acknowledges that all warranties, expressed or implied, of the goods are contained on the labels affixed to the goods. IFC makes no representations or warranties about the goods. There are no terms, conditions, or warranties, expressed or implied, of merchantability, fitness for a particular purpose, or otherwise of the goods other than or different from those contained on the labels affixed to the goods. IFC shall in no event be liable for consequential damages resulting from the performance of its services and its use of any products pursuant to this Agreement or for any alleged breach of such limited warranties as are provided herein.
- c. IFC agrees to exercise all reasonable and practical efforts necessary to cause the effective control of the target infestation—See #4 --however, IFC does not guarantee 100% control of the target pests, nor is there any guarantee that the commodities and/or space being treated will be protected from re-infestation upon completion of the work performed hereunder.
- d. IFC agrees that services performed will be under the direct supervision of or by a qualified and/or certified applicator as required by EPA.
- e. IFC maintains public liability and property damage insurance with those who are licensed to do business in the state of the facility to be treated.
- f. IFC will notify the designated site contact if there are any changes in the service scope or materials used.

9. CLIENT ASSUMES THE FOLLOWING RESPONSIBILITIES:

- a. It is the responsibility of the Client to extinguish and/or remove all sources of heat or fire from treated areas when necessary.
- b. It is the responsibility of the Client to tag and identify all switches to be used by IFC personnel during treatment and aeration, and to lockout or seal off all switches to be avoided by IFC crews.
- c. It is the responsibility of the Client to remove from the fumigated area or the surrounding area, anything (product or equipment) that may be adversely affected by the fumigation process or exposure to the fumigant.
- d. It is the responsibility of the Client for treating all confined spaces as an (permit – required confined space) area, which is subject to specific requirements under OSHA guidelines (#1910.146). Specifically before an employee enters the space, the internal atmosphere shall be tested with a calibrated direct-reading instrument for fumigants, DDVP and others as required.
- e. It is the responsibility of the Client to inform IFC of all past fumigations and/or fumigation history of the fumigated area.
- f. It is the responsibility of the Client to inform IFC of any condition(s) of the premises to be fumigated that might potentially impact the performance and/or the safety of the fumigation treatment.
- g. It is the responsibility of the Client to inform IFC of any moisture, water, liquids, and/or high humidity condition present in or on the commodity to be fumigated prior to any fumigation.
- h. The Client agrees to comply with any and all instructions attached hereto, before, during and after the pesticide application and shall not permit, allow nor suffer any person or animal to enter the pesticide treated area until such property shall have become or been made safe for occupancy in accordance with label instructions.
- i. The Client assumes only the risk of Client's failure to follow the aforesaid instructions. Client further agrees to indemnify, defend and hold IFC harmless from all claims, demands, causes of action, losses, damages or expenses whatsoever, including costs and attorney's fees, arising by reason of the entry of any person or persons or property upon the pesticide treated premises from and after the date and time of the completion of the pesticide application work hereunder if said entry is contrary to the aforesaid instructions. For the purpose of this paragraph and paragraph (8)(c) above, the pesticide application work hereunder shall be deemed to have been completed when IFC's employees leave Client's premises after completion of the work specified herein, and shall not be deemed to relate to any other services performed for any other reason by IFC thereafter.
- j. Client is to provide a guard service and assume complete responsibility for evacuating all people and animals and keeping all unauthorized people out of the treated areas, adjacent areas, plant facilities and grounds during the time of pesticide application through to completion of aeration. Client is to remove all items which are not to be exposed to the pesticides during the pesticide application period. IFC assumes responsibility only for releasing the pesticide and aeration of the treated areas.
- k. Client is to assume responsibility for filing a copy of service records on site.
- l. The Client shall pay for the above pesticide application on the basis indicated below.

(i) TOTAL FEE OF **\$730.00/application** plus applicable sales tax

(II) Client understands and agrees that the charges for services provided under this Agreement are based solely upon the cost to IFC of the services provided and are not related to the value of Client's premises or the contents therein. Client understands and agrees that the amounts payable by Client are not sufficient to warrant IFC assuming any risk of incidental and/or consequential damages including, but not limited to, damages to Client's property, product, equipment, downtime, and/or loss of business. Client further understands and agrees that IFC is not warranting and/or representing that it is assuming any risk of such incidental and/or consequential damages.

(III) Since it is impractical and extremely difficult to fix actual and/or anticipated damages which may arise due to the actions and/or inaction of IFC or its employees, if, notwithstanding the above provisions, there should arise any liability on the part of IFC, such liability shall be limited to IFC's applicable insurance coverage and/or limits. This sum shall be complete and exclusive remedy against IFC for any claim and/or action for damages.

(IV) Client agrees that in no case will IFC be liable for any punitive, exemplary, consequential, or special damages or for lost profits or attorneys' fees.

(V) Client agrees that if the treatment is cancelled for any reason, all reasonable expenses incurred by IFC, such as shipping charges, travel expenses, etc., will be paid by the Client.

(VI) Client agrees to IFC's terms of net 30 days from date of invoice.

- m. If the area to be treated or the amount of pesticide to be used must be increased or decreased as a result of extenuating circumstances, the price quoted will be changed accordingly.
- n. If pesticide application is done on New Year's, Easter, July 4th, Thanksgiving Day, Christmas Eve, or Christmas Day, there will be an additional charge.

10. EQUIPMENT & MATERIALS: All equipment and materials will be brought to the site by IFC personnel. If shipped to the facility in advance, IFC and Client will arrange for a secure storage area.

11. INSPECTION PRIOR TO TREATMENT: If after the inspection of the facility, commodity or space to be treated by IFC employees, it is determined that the treatment should not be completed, for any reason whatsoever, IFC shall promptly notify Client and this Agreement shall become null and void and of no further effect.

12. APPLICATION OF FUMIGANT TO CONTAINERS:

- IFC is only responsible for the proper pesticide application in accordance with label requirements and all other applicable regulations.
- Client is responsible for assisting IFC in developing a Fumigation Management Plan (FMP).
- Client is responsible for vehicle security until the placards have been removed in accordance with label requirements and all other applicable regulations.
- Client is also responsible for notifying receiver that the vehicle has been fumigated and of the legal requirements, including an FMP, for receiving, aerating and removing the placards from the fumigated vehicle(s) by properly trained, licensed or certified applicators. This notification must also include the consignee's responsibility for proper and legal disposal of the metal phosphide residue.

13. **OTHER PROVISIONS:** If IFC is required to continue to monitor the level of the fumigant beyond 12 hours from the conclusion of the fumigation, the Client will be charged at a rate of \$350.00 per day plus additional expenses incurred.

Fumigation price is based on the current cost of methyl bromide. If there is an increase in the cost of methyl bromide, price will have to be recalculated and a revised Agreement submitted. Additional gas to be charged at current price.

14. This Agreement shall be the entire Agreement between Client and IFC. No other agreements, understandings or representations, whether written or oral, with respect to the Agreement shall be binding as they shall be merged into and superseded by this Agreement. Moreover, no course of dealing or usage of trade will be considered as an express or implied portion of this Agreement and shall not be used in any construction of the Agreement. The parties have each had an opportunity to review and amend this Agreement and any ambiguities shall not be interpreted against the party that originally drafted it. Client warrants and acknowledges that Client has not relied on or been induced by any other agreements, understandings, or representations, whether written or oral, in signing this Agreement. The terms of the Agreement stated herein may not be amended or altered unless a written change is approved and signed by a Corporate Officer of IFC. No other employees or agents of IFC have authority to amend or alter any part of this Agreement. If any provision or portion thereof, of this Agreement is found to be invalid or unenforceable, it shall not affect the validity or enforceability of any other part of this Agreement.

15. This Agreement shall be governed by and construed under the laws of the State of Illinois, without regard to its conflicts of laws principles.

AGREEMENT MUST BE RESUBMITTED IF NOT SIGNED WITHIN 60 DAYS OF THE DATE BELOW. IF SCHEDULED DATE IS MUTUALLY AGREED UPON BY IFC AND CLIENT, AGREEMENT MUST BE RETURNED TEN (10) DAYS PRIOR TO SCHEDULED DATE.

ACCEPTANCE: P. O. No. _____
(If Required)

SUBMITTED BY:

THE INDUSTRIAL FUMIGANT COMPANY, LLC

(Legal Company Name)

By: _____

By: Lynn Hansel

Title: _____

Title: Lynn Hansel
Vice President of Administration

Date: _____

Date: October 19, 2017

14. This Agreement shall be the entire Agreement between Client and IFC. No other agreements, understandings or representations, whether written or oral, with respect to the Agreement shall be binding as they shall be merged into and superseded by this Agreement. Moreover, no course of dealing or usage of trade will be considered as an express or implied portion of this Agreement and shall not be used in any construction of the Agreement. The parties have each had an opportunity to review and amend this Agreement and any ambiguities shall not be interpreted against the party that originally drafted it. Client warrants and acknowledges that Client has not relied on or been induced by any other agreements, understandings, or representations, whether written or oral, in signing this Agreement. The terms of the Agreement stated herein may not be amended or altered unless a written change is approved and signed by a Corporate Officer of IFC. No other employees or agents of IFC have authority to amend or alter any part of this Agreement. If any provision or portion thereof, of this Agreement is found to be invalid or unenforceable, it shall not affect the validity or enforceability of any other part of this Agreement.

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ACCEPTANCE:

P. O. No. _____

(If Required)

USA Interargo LLC

(Legal Company Name)

By: _____

Suren Vardanian

Title: _____

Terminal Manager

Date: _____

October 20, 2017

SUBMITTED BY:

THE INDUSTRIAL FUMIGANT COMPANY, LLC

By: _____

Lynn Kensei

Title: _____

Vice President of Administration

Date: _____

October 19, 2017

10/20/17

Exemption 6

Val

EP Critical Use Certification – Service

Certificate No. 3585

SECTION 1 METHYL BROMIDE USER INFORMATION

Company Name & Address: USA Intercargo, LLC
7751 West 88th Street
Bridgeview, Illinois 60455

1. TYPE OF METHYL BROMIDE USER:

- ☒ Non-critical User, methyl bromide obtained from pre-existing inventory
- ☐ Critical User: Post-Harvest Use (user must sign Section 2 below)
- ☐ QPS, methyl bromide obtained from QPS inventory
Justification for use:

2. CONSORTIUM CODE:

- ☐ Rice Millers ☐ PFI ☐ Bakeries ☐ NAMA ☐ NPMA ☐ OTHER ☒ NONE

3. METHYL BROMIDE INVENTORY TYPE:

- ☐ CUE ☐ CUI/CUE ☐ CSA ☐ QPS ☒ Pre-existing Inventory

4. COMMODITY TREATED: One (1) Container

5. QUANTITY OF METHYL BROMIDE:

Initial Gas: _____

Add Gas: _____

Estimated Methyl Bromide Quantity: 9 lbs* Total Actual Lbs: _____

6. CUBIC FOOTAGE TREATED:

Estimated Cubic Footage: 3,000 ft³* Actual: _____ ft³

* This quantity reflects an estimate. The actual amount of methyl bromide used and cubic footage treated may vary at time of treatment. Actual quantity and cubic footage may be verified by reviewing State required pesticide application records.

SECTION 2 CRITICAL USER CERTIFICATION

EPA prohibits suppliers or third party applicators from selling methyl bromide to approved critical users of methyl bromide without first obtaining a signed and dated certification stating the following:

"I certify, under penalty of law, I am an approved critical user and I will use this quantity of methyl bromide for an approved critical use. My action conforms to the requirements associated with the critical use exemption published in 40 CFR Part 82. I am aware that any agricultural commodity within a treatment chamber, facility or field I fumigate with critical use methyl bromide cannot subsequently or concurrently be fumigated with non-critical use methyl bromide during the same control period, excepting a QPS treatment or a treatment for a different use (e.g., a different crop or commodity). I will not use this quantity of methyl bromide for a treatment chamber, facility, or field that I previously fumigated with non-critical use methyl bromide during the same control period, excepting a QPS treatment or a treatment for a different use (e.g., a different crop or commodity), unless a local township limit now prevents me from using methyl bromide alternatives or I have now become an approved critical user as a result of rulemaking."

I also certify, with a reasonable expectation, that the applicable location of methyl bromide use will be subject to one or more of the following Limited Critical Conditions (LCC) listed in 40 CFR Part 82, Appendix L, Column C, which is applicable to location/user and critical use:

- > moderate to severe infestation of beetles, weevils, or moths,
- > the presence of sensitive electronic equipment subject to corrosivity,
- > time to transition to an alternative.

Printed Name: N/A

Date: N/A

Signature: N/A

CONFIDENTIAL BUSINESS INFORMATION – not to be distributed without express written permission from IFC

10/12

METHYL BROMIDE

HOLD HARMLESS

This is to certify that USA Intercargo, LLC, 7751 West 88th Street, Bridgeview, Illinois, will hold harmless The Industrial Fumigant Company, LLC for any adverse effect, directly or indirectly, Methyl Bromide has on the fumigated product.

THE INDUSTRIAL FUMIGANT COMPANY

By: Lucretia Hordanian
Title: Terminal Manager

By: Lynn Hanel
Lynn Hanel
Vice President of Administration

October 20, 2017
Date Signed

October 19, 2017
Date Signed



The Industrial Fumigant Company, LLC

13420 West 99th Street • Lenexa, Kansas 66215-1385

(913) 782-7600 • Fax: (913) 782-6299 • Website: www.indfumco.com • E-mail: ifc@indfumco.com

CERTIFICATE OF FUMIGATION

October 27, 2017

THIS IS TO CERTIFY that the issuer of this certificate is a representative of a duly licensed fumigation company duly operating pursuant to and as authorized by the laws and regulations of the State of Illinois, USA.

IT IS FURTHER CERTIFIED, that all product of USA Intercargo, LLC has been fumigated with Methyl Bromide according to the label directions of the manufacturer of said fumigant as approved by the U. S. Environmental Protection Agency (EPA):

Location where fumigated:	USA Intercargo, LLC 7751 West 88 th Street Bridgeview, Illinois 60455
Commodity fumigated:	Used Vehicles
Date fumigated:	October 23, 2017
Fumigation Duration:	24 Hour Hold
Fumigation Dosage:	3 Lbs./1,000 Cubic Feet at 60-68° F
Fumigant Lot #	8200AE272
Licensed fumigator:	Exemption 6 [Redacted]
Trailers Fumigated:	TCNU3286362

The Industrial Fumigant Company, LLC

Lynn Hansel
Vice President of Administration

**BILLING REPORT
THE IFC COMPANIES**

624066

BID/JOB # 3 15 012 17

3585

CUSTOMER# _____ SHIP _____ WHSE IL 410 PO# _____

BILL TO: US Intercargo, LLC SHIP TO: Same

7751 West 88th St.

Bridgeview, IL 60455

BILLING INFORMATION:

SERVICE DATE (S) *10/23/17 - 10/24

Trailer Fumigation: 1@ \$730.00

730.00

Note: This has been paid with check # 4703

TOTAL \$730.00

Pesticide Applied Methyl Bromide **Amount Applied** 9 lbs

Pesticide Applied _____ **Amount Applied** _____

COMMISSIONS:

Admin _____ Prod _____

TECHNICIAN REPORT MUST BE ATTACHED

Kyle Ponton
5 Martin Herrington
Brady Ponton
Aaron Parrish
Derek Mesenbring

052-074978

Exemption 6

Received	11/01/2017
Compliance	
Contract	
Completed	11/1

REPLACED EQUIPMENT _____ Proketch solid lid
_____ EZ Klean bait station
_____ Roguard Bait station
_____ 4 ft. shatterShield Bulb

_____ ProKetch Guard
_____ Bait station Tags
_____ Vector 907 Glue Boards
_____ Vector Plasma bulbs

_____ Treco Storgard II Dome
_____ Treco Ultra Combi Storgard II Wing
_____ Treco ultra combi rebait tray
_____ Trapper LTD Glueboards



IFC FUMIGATION MANAGEMENT PLAN (FMP)

Methyl Bromide Trailer Fumigations

USA INTERCARGO, LLC
7751 W 88th St Bridgeview, IL 60455
10/19/17

The following Fumigation Management Plan (FMP) is an organized, written description of the required steps involved to help ensure a safe, legal, and effective fumigation. This plan is intended to help organize the fumigation prior to actual treatment. This plan is designed to be flexible enough to allow the experience and expertise of the fumigator to make changes based on circumstances which may exist in the field. This FMP also consists of supplemental documents such as "IFC Fumigation Service Reports," facility maps, and other supplemental documents used during the actual fumigation.

Prepared By:

hFC Manager's Statement

Planned and Reviewed With:

(Customer Signature)

A copy of this FMP, as well as product labeling, the Applicator's Manual, and MSDS, will be on file at this location with the individual listed below. This same information also is on file at the IFC Corporate Office and may be obtained by calling (800) 477-4432.

SUREN VARDANIAN, TERMINAL MANAGER

Norm 134

SECTION A: PRELIMINARY PLANNING AND PREPARATION INFORMATION

1. Contact information:

[illegible]



IFC FUMIGATION MANAGEMENT PLAN (FMP) Methyl Bromide Trailer Fumigations

USA INTERCARGO, LLC
7751 W 88th St. Bridgeview, IL 60455
10/19/17

The following Fumigation Management Plan (FMP) is an organized, written description of the required steps involved to help ensure a safe, legal, and effective fumigation. This plan is intended to help organize the fumigation prior to actual treatment. This plan is designed to be flexible enough to allow the experience and expertise of the fumigator to make changes based on circumstances which may exist in the field. This FMP also consists of supplemental documents such as "IFC Fumigation Service Reports," facility maps, and other supplemental documents used during the actual fumigation.

Prepared By:

Planned and Reviewed With:

(IFC Manager's Signature)

(Customer Signature)

A copy of this FMP, as well as product labeling, the Applicator's Manual, and MSDS, will be on file at this location with the individual listed below. This same information also is on file at the IFC Corporate Office and may be obtained by calling (800) 477-4432.

SUREN VARDANIAN, TERMINAL MANAGER

Name Title

SECTION A: PRELIMINARY PLANNING AND PREPARATION INFORMATION

1. Contact Information:

Facility Contact/Manager Name: SUREN VARDANIAN	Exemption 6
Title: TERMINAL MANAGER	Title: Exemption 6
Day phone number: 317-835-1887	Day phone number: Exemption 6
Night phone number: SAME	Night phone number:
Mobile:	Mobile: Exemption 6
Pager:	Pager:
Additional Contact Information:	Additional Contact Information:
	BRAD HENRY, IFC V.P. EASTERN U.S.: 913-219-8875
	CHRIS TITTLE, IFC, AREA MANAGER: 262-221-7405
IFC Corporate Office: (800) 477-4432	

SECTION A: PRELIMINARY PLANNING AND PREPARATION INFORMATION (continued)**2. Facility Information:**

1. Construction material: TRAILERS TYPICALLY CONSTRUCTED OF METAL WALLS AND METAL OR WOOD FLOORS.
2. Age of structure: VARIES.
3. Condition/maintenance of structure: GOOD UNLESS OTHERWISE NOTED.
4. Fire or combustibility hazards: GRAIN OR FLOUR DUST, PHOSPHINE GAS ABOVE THE LEL OF 1.8% V/V.
5. Escape routes: N/A, TRAILERS LOCATED OUTSIDE.
6. Any unique hazards or structural characteristics of the facility: NONE KNOWN.
7. Are utilities readily accessible, or are special procedures necessary? SEE FACILITY MANAGEMENT BEFORE ACCESSING.

3. Site Map:

Attach a site map to this plan and indicate on the map the following items when applicable:

1. Mark on the map the name and address of facility where treatment will be conducted, also a date the map was created or revised.
2. Location of designated Emergency Evacuation Areas as designated by the customer: SEE FACILITY MAP AND SECTION B.
3. Location of fumigated areas: SEE FACILITY MAP.
4. Emergency shut-off stations for electricity, water, and gas: N/A, TRAILERS LOCATED OUTSIDE.
5. Nearest telephone or other means of communication away from the treated site: IFC MOBILE PHONE, SEE PAGE 1 CONTACT INFORMATION.
6. Location of dry or wet disposal drum: N/A, METHYL BROMIDE USED.

4. Exposure Time Considerations and Determination of Dosage:

Check all that apply and provide additional site-specific notes as needed.

- ☒ Exposure time and dosage is based on product labeling requirements, see IFC Service Reports for further information.
- ☒ Downtime required will be adequate to allow for proper sealing, sufficient exposure time to meet labeling requirements, provide insect efficacy, and also allow for aeration. Length of aeration will be dependent on gas monitoring conducted during the actual fumigation process. See IFC Fumigation Service Reports for further information on the actual fumigation treatment performed.
- ☐ Additional Notes:

5. Additional Planning:

- ☒ Required safety equipment is in place and necessary manpower is available to complete a safe and effective fumigation and/or aeration.
- ☒ Previous fumigation records and/or FMPs will be consulted where available.
- ☒ Personnel performing the fumigation and/or aeration have read the container label and Applicator's Manual and are aware of hazards that may be encountered, proper selection, and use of personal protective equipment and monitoring devices.
- ☐ Additional Notes:

SECTION B: PERSONNEL

Check all that apply and provide additional site-specific notes as needed.

1. Emergency Response/Local Authority Numbers:

Name of Local Authority:	Notification Number: (Emergencies: Dial 911)
Fire: BRIDGEVIEW FIRE DEPARTMENT	708-924-8250
Police: BRIDGEVIEW POLICE DEPARTMENT	(708) 468-2131
Hospital: CHRIST HOSPITAL	(630) 312-5000
Other (Sheriff, Physician, etc.):	708-684-8000
National Poison Control:	(800) 221-1222
Chemtrec – 24 hour response on Labels and MSDS	(800) 424-9300

2. Emergency Response Procedure – Site-Specific:

1. EVACUATE ALL PERSONNEL AND GATHER AT THE DESIGNATED EVACUATION AREA LISTED BELOW.
2. COMPLETE APPROPRIATE EMERGENCY NOTIFICATIONS (911, COMPANY OFFICIALS, AND ACCIDENT/INCIDENT REPORTING LISTED IN #5 BELOW).

3. Personnel Notification:

- ☒ List below specific procedures which the customer has developed for notifying all personnel in and around the structure and/or area to be fumigated. For more details on notification requirements, see current product labeling (Guidance FMP Section B. Personnel).
1. WARNING PLACARDS ARE PLACED ON ENTRANCES TO THE FUMIGATED SITE BY IFC.

4. Personnel Who Routinely Enter the Area to be Fumigated:

- ☐ The number and identification of personnel who routinely enter the area to be fumigated is attached to this plan as a separate list. These individuals are notified by site management prior to fumigation work conducted in the area.
- ☒ The area to be fumigated (bins, railcar, building, etc.) is not entered by personnel once it is under gas.

5. Accident/Incident Reporting:

- ☒ Local authorities will be contacted for immediate emergency response.
- ☒ Contact facility officials.
- ☒ In addition, contact IFC concerning any accident or incident involving the fumigation (see page 1 of this plan).
- ☒ All personnel are instructed to report to company management any theft of fumigant and/or equipment related to the fumigation.
- ☐ Additional Notes:

6. Evacuation Area: In the event the area is evacuated, personnel should report to the area listed below, as designated by the customer, so that everyone can be accounted for:

NORTH SIDE OF BUILDING NEAR 88TH ST; SEE FACILITY MAP

SECTION C: MONITORING

Check all that apply and provide additional site-specific notes as needed.

1. Site-Specific Safety Measures and Security Plan:

The following safety/security measures will be taken during the fumigation period and aeration process.

- ☒ Proper placarding of site entrances is performed prior to fumigant application.
- ☒ Entrances are locked or otherwise secured to prevent unauthorized personnel from entering treated areas.
- ☒ The fumigation is conducted in a secure area and protected from unauthorized entry.
- ☐ A guard or watchman is on duty.

☒ **Additional Notes:**

FUMIGATED TRAILERS ARE LOCATED AWAY FROM THE FACILITY IN A REMOTE AREA OF THE PARKING LOT.

2. Safety Monitoring Plan:

The following safety measures and monitoring plan will be used to ensure that nearby workers, residents, or bystanders are not exposed to levels above the allowed limits during the fumigation period and aeration process.

- ☒ To demonstrate that bystanders will not be exposed to concentrations above the allowable limits, gas monitoring will occur by IFC around the fumigated site after fumigant application and during the aeration process. See Service Reports or other supplemental documents for further information.
- ☐ Gas readings will be taken by IFC at the start of each work shift in occupied areas or buildings near the fumigated site.
- ☐ Facility workers in the area near the fumigated site are trained and equipped to monitor gas levels and will maintain gas monitoring records at the following location:
- ☒ Gas monitoring will be conducted by means of: ELECTRONIC DETECTION EQUIPMENT AND/OR DETECTOR TUBES. SEE IFC FUMIGATION SERVICE REPORTS OR GAS MONITORING RECORDS.
- ☒ Additional site-specific monitoring plans:
 1. AIR MONITORING IS CONDUCTED BY THE IFC CERTIFIED APPLICATOR. SEE IFC FUMIGATION SERVICE REPORTS OR OTHER SUPPLEMENTAL DOCUMENTS.
- ☒ The following plan is in place for aerating occupied areas if the gas level approaches the TLV (describe plan).
 1. EVACUATE ALL PERSONNEL IN AREA TO A SAFE LOCATION.
 2. MONITOR SAFE LOCATION.
 3. IDENTIFY SOURCE.
 4. CLOSE OFF SOURCE AND TURN ON EXHAUST FANS OR OTHER AIR HANDLING EQUIPMENT IF PRESENT.
 5. CONTINUE TO MONITOR ALL AFFECTED AREAS UNTIL GAS CONCENTRATION IS BELOW THE TLV.

3. Efficacy Monitoring Plans:

A READ LINE WILL BE PLACED IN THE BACK OF THE TRAILER FOR CONDUCTING EFFICACY READINGS.

4. Monitoring Records:

Phosphine monitoring completed during the fumigation process is documented on IFC Monitoring Records. These records are maintained with IFC Fumigation Service Reports and are readily available by contacting the IFC Applicator in Charge listed on page 1 of this plan or by contacting the IFC Corporate Office at (800) 477-4432.

SECTION D: NOTIFICATION

1. **Notification of Local Authorities:** See the IFC Fumigation Service Report for further notification information and Section B for local authority phone numbers.

- ☐ Local authorities are contacted annually.
☒ Local authorities are contacted prior to each fumigation.
☐ Additional Notes:

2. **Written Notification For In-transit Vehicles:**

- ☐ A copy of notification letters sent by the shipper to each receiver is on file at this location. It is the shipper's responsibility to provide written notification to the receiver of fumigated railcars, along with a copy of the Applicator's Manual.
☒ Additional Notes:
THIS SECTION IS NOT APPLICABLE.

3. **Plans for Notification of Nearby Residents:**

In the event of an emergency requiring evacuation of nearby residents, local authorities listed under Section B of this plan will be contacted. Appropriate gas monitoring must first be conducted by the fire department or First Responders in order to determine actual evacuation needs.

SECTION E: SEALING PROCEDURES

Check all that apply and provide additional site-specific notes as needed.

1. Structure Sealing Capability:

- ☒ The structure or area to be fumigated has been inspected and determined suitable for fumigation.
- ☒ Individual railcars, trailers, or containers are inspected prior to being fumigated. If they cannot be sufficiently sealed, they will not be fumigated.
- ☒ Sealing will be adequate to control the target pest. Care will be taken to ensure that sealing materials are adequately applied so that they remain intact until the fumigation is complete.
- ☒ **Additional Notes:**
PRIOR TO LOADING, FACILITY CONTACT OR DESIGNATED PERSONS NEED TO INSPECT FLOOR AND WALLS OF TRAILER FOR OPENINGS OR SIGNS THAT TRAILER WILL HOLD GAS.

2. List Recent Construction/Remodeling That May Affect the Fumigation:**3. Site Sealing Requirements:**

Specific sealing requirements may vary from this plan depending on areas under fumigation.

- ☐ The number of personnel required to complete sealing of this site is typically:
AN ESTIMATED ONE (1) IFC CERTIFIED APPLICATOR.
- ☒ List general sealing procedures below:
 1. THE BACK DOOR AND ANY OTHER OPENINGS SUCH AS VENTS, FLOOR DRAINS, AND SECONDARY DOORS WILL BE SEALED WITH PLASTIC, TAPE, AND GLUE.
 2. TRAILER DOORS ARE LOCKED DURING THE FUMIGATION.
 3. WARNING PLACARDS ARE PLACED ON THE FRONT AND BACK OF THE TRAILER.
- ☐ List special sealing requirements:
 - 1.
 - 2.
 - 3.

SECTION F: APPLICATION PROCEDURES AND FUMIGATION PERIOD

Check all that apply and provide additional site-specific notes as needed.

1. Application Procedures:

- ☒ All fumigant will be applied in accordance with product labeling requirements.
- ☒ When entering an area under fumigation, two or more people under the direct supervision of a certified applicator will be present, wearing appropriate personal protective equipment. If state requirements are more restrictive than the federal product label, those requirements for entering an area under fumigation will be followed.
- ☒ Fumigant is applied from outside the area being treated.
- ☐ Confined space and lockout tagout procedures will be followed where required.
- ☐ Electric lights as well as all non-essential electrical motors in the fumigated structure will be turned off where applicable.
- ☐ Additional Notes:

2. Points of Fumigant Application:

- ☐ For spot or bin fumigations, a list of treated areas is attached to the IFC Fumigation Service Report.
- ☒ For trailer, container, or railcar fumigations, the identification/unit number of the vehicle fumigated is listed on the IFC Fumigation Service Report.
- ☐ For railcars containing round hatches, fumigant is applied under two hatches per car, and each hatch containing fumigant is placarded. See IFC Fumigation Service Reports for the car or container I.D. number which was fumigated.
- ☐ For railcars containing slot top hatches, fumigant is applied under two hatches per car, and each hatch containing fumigant is placarded. See IFC Fumigation Service Reports for the car or container I.D. number which was fumigated.
- ☐ For boxcars, the side door is opened and the fumigant is placed inside the car. Both side doors are sealed, placarded, and secured.
- ☒ For trailers or containers, fumigant is applied at the back end of the trailer/container near the doors.
- ☒ Additional Notes on How Fumigant is Applied:
FUMIGANT IS APPLIED THROUGH A HOSE FROM A PRESSURIZED CYLINDER.

SECTION G: POST-APPLICATION OPERATIONS

Check all that apply and provide additional site-specific notes as needed.

1. Cleanup Requirements (personnel, equipment, time):

EMPTY FUMIGANT PACKAGING MATERIAL, SEALING MATERIAL OR OTHER PAPER TRASH IS PROPERLY DISCARDED. SPENT FUMIGANT IS REMOVED FROM THE TREATED AREA AND DEACTIVATED ON SITE.

PPE AND MONITORING EQUIPMENT IS AVAILABLE FOR USE IF NECESSARY.

2. Deactivation Methods for Spent Fumigant:

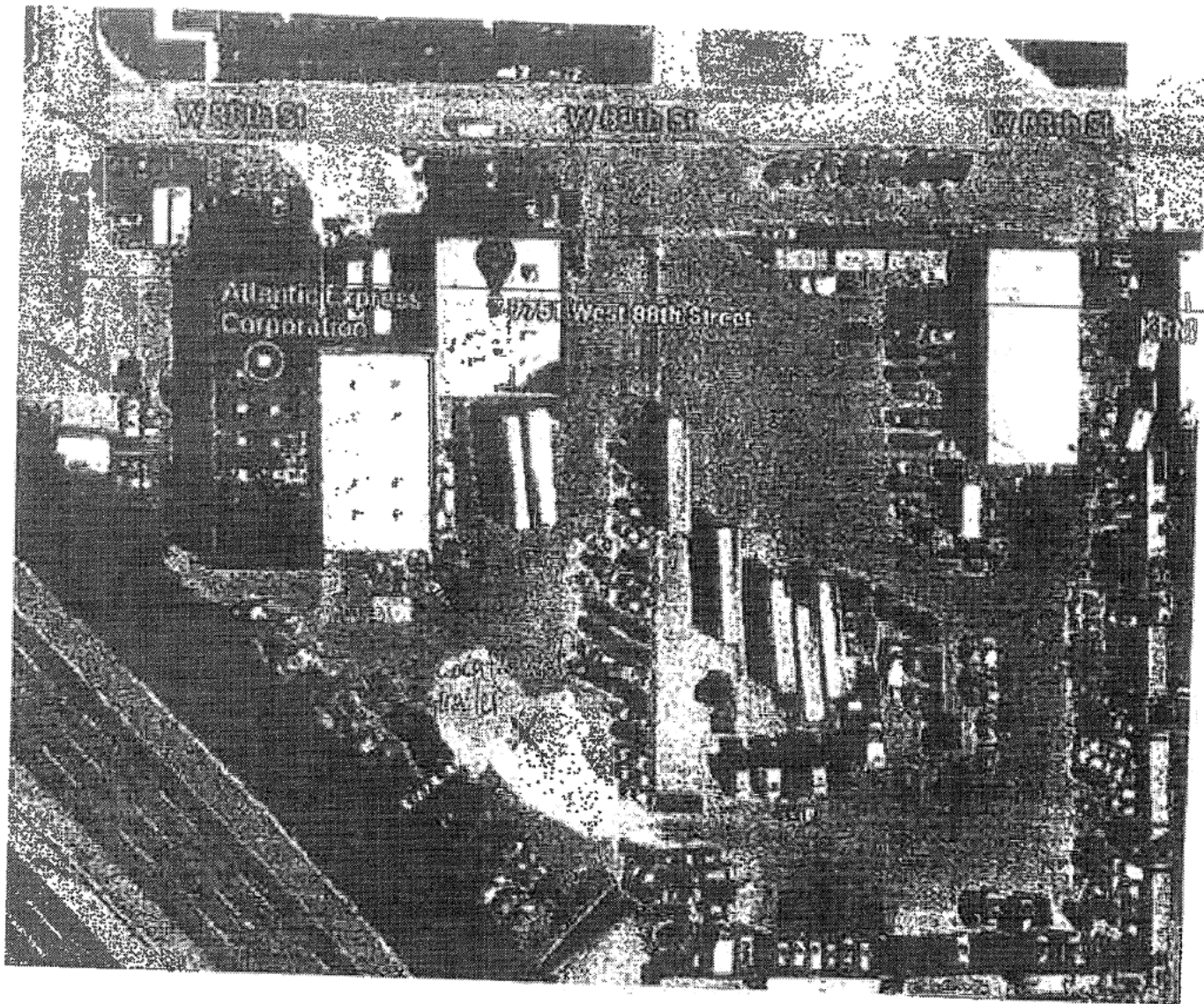
- ☐ Dry deactivation is utilized at this job site. An adequate number of deactivation barrels are available which are located in a secure site away from occupied areas. These barrels are properly posted according to label requirements and further locked.
- ☐ Wet deactivation is utilized at this job site.
- ☒ **Additional Notes on Deactivation:**
NO DEACTIVATION NECESSARY; USING METHYL BROMIDE

3. List Aeration Requirements: (ex: special needs for aeration, such as in-place fans to be utilized or supplemental fans that need to be brought to the job site).

- ☐ Passive aeration is performed on railcars. Placards and screens are left in place during aeration.
- ☐ The following fans or air handling equipment will be utilized during the aeration process:
- ☐ Un-aerated commodity is transferred directly from the fumigated site (railcar, bin, etc.) to a new storage structure. The new storage structure is placarded if it contains more than 0.3 ppm phosphine gas.
- ☒ **Additional Notes:**
PASSIVE AERATION AND/OR PORTABLE FANS WILL BE UTILIZED, DEPENDING ON GAS CONCENTRATIONS PRESENT AT THE END OF THE FUMIGATION EXPOSURE PERIOD.

4. Additional Post-Application Operations:

- ☒ Suitable gas detection equipment will be used for final clearing before re-entry is allowed (see IFC Gas Monitoring Records for further information).
- ☒ The commodity and space within the trailer will be cleared to 0.3 ppm or less of phosphine gas before being allowed onto public roads.
- ☒ Warning placards will be removed by a certified applicator or a person with documented training after the structure and commodity fumigated is aerated to 0.3 ppm or less of phosphine gas.
- ☒ Upon final clearing, IFC will notify facility management that employees or other persons may return to work or otherwise be allowed to re-enter the aerated structure.
- ☒ Post-application operations will be handled by the receiver.
- ☐ **Additional Notes:**



ST
60455

10/19/17

Exemption 6

Cert. # 3587

SPACE FUMIGATION WORKSHEET

29-Nov-17

Company USA Intercargo, LLC

JOB # 3 15 014 17

31-Oct-17

Phys. Address 7751 West 88th Street

Mail Address City/State/Zip Bridgeview, Illinois 60455

CU.FT. 3,000

BU.CAP.

		QTY	PRICE	TOTAL	SOURCE	ACTUAL
R20-241	Fumi-Strips (Strips/20)		\$170.00	\$0.00		
R20-244	Fumi-Cel (Plates)		\$9.69	\$0.00		
70-1530	Fumi-Cel Bags		\$4.13	\$0.00		
			\$0.00	\$0.00		
R20-222	Phostoxin (Tablets) Flask/333		\$23.22	\$0.00		
R20-233	Phostoxin (Pellets) Flask/1660		\$23.93	\$0.00		
R20-237	Phos. Prepac (Prepac 1)		\$11.25	\$0.00		
R20-248	Magtoxin Prepac (Spot) Pouch		\$56.25	\$0.00		
R20-346	EcoFume (lb)		\$5.66	\$0.00		
			\$0.00	\$0.00		
			\$0.00	\$0.00		

TYPE OF FACILITY

Warehouse

MANAGER

Mr. Suren Vardanian, Terminal Manager
E-Mail: suren@usaintercargo.com

DESIGNATED SITE CONTACT NAME & TITLE

Suren Vardanian, Terminal Manager

TELEPHONE

(317) 835-1887
FAX: (317) 758-5930

TARGET PEST

Brown Marmorated Stink Bug

COMMODITY

Used Vehicles

SERVICE ADDRESS/NOTES:

Approved by Brad

Methyl Bromide Fumigations:
Areas to be Treated: Container(s)
Volume: 3,000 Cubic Feet EachCost of Service:
\$730.00/ Each Application (Per Kyle)
- Client to sign Hold Harmless Agreement

Application Date: November 2, 2017

Worksheet Notes:
Dosage Rate: 3 Lbs/1,000 Cubic Feet
Per Kyle - 2 more fumigations in 2017. Estimated 6,000 Cubic Feet and 18 Lbs. on Cert.

E-Mail: Suren Vardanian

E-Mail: Kyle / Brad

Previous Cost: \$730.00

GAS TO BE SHIPPED

0 125 ProFume	0
0.06 150 MB	14
100# Cyl Add Gas	0

Methyl Bromide ADD GAS: \$28.53/Lb.
EcoFume: \$5.66/Lb. / ProFume: \$9.20/Lb.

DATE SCHEDULED

Open through 2017

TURNKEY

SUPER ONLY

SUPER & MAT

\$496.67 Per 1000 ft3
#DIV/0! Per Bushel

Effective: 1/30/2017

Subcontractor Information:

Company Name:

Address:

Contact Name:

Contact Title:

Contact E-Mail:

Contact Numbers: Phone:

Fax:

Cell:

For MB, IS THIS A NEW FUMIGATION SITE?

YES

NO

HAS MB BEEN USED PREVIOUSLY AT THIS SITE
BY ANOTHER PEST MANAGEMENT FIRM OR THE
CUSTOMER THIS YEAR?

YES

NO

Contact Corporate for current price if additional materials are needed that are not on this worksheet.